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5 Attorneys for Defendant  
6 GRAPH FOUNDATION, INC.

7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION  
10

11 NEO4J, INC., a Delaware corporation, and  
12 NEO4J SWEDEN AB, a Swedish corporation

13 Plaintiffs,

14 vs.

15 GRAPH FOUNDATION, INC., an Ohio  
corporation, GRAPHGRID, INC., and  
16 ATOMRAIN, INC., a Nevada corporation

17 Defendants.  
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Case No. 5:19-CV-06226-EJD

**STIPULATION EXTENDING BRIEFING  
DEADLINES ON MOTION TO STRIKE  
AND [PROPOSED] ORDER**

1 Plaintiffs Neo4J, Inc. and Neo4j Sweden AB (“Plaintiffs”), and Defendant Graph  
2 Foundation, Inc. (“GFI”), by and through their attorneys of record (collectively, the “Parties”),  
3 HEREBY STIPULATE AS FOLLOWS:

4 WHEREAS, GFI filed its Answer to the Amended Complaint on November 30, 2020.

5 WHEREAS, on January 7, 2021, Plaintiff filed its Motion to Strike the Fifth Affirmative  
6 Defense of GFI’s Answer to the Amended Complaint.

7 WHEREAS, pursuant to the Court’s Order on the parties’ prior stipulation [Dkt. 103],  
8 GFI’s Opposition to the Motion to Strike is currently due on February 4, 2021 and Plaintiffs Reply  
9 in support of the Motion to Strike is currently due on February 18, 2021.

10 WHEREAS, pursuant to the Court’s Order on the parties’ prior stipulation, there shall be  
11 no hearing or argument on the Motion to Strike and for the Court to rule on the motion once all  
12 briefing is complete.

13 WHEREAS, GFI has requested, and Plaintiff has agreed to a further modest extension of  
14 the deadline for GFI’s Opposition to the Motion to Strike.

15 IT IS HEREBY STIPULATED THAT:

16 1. The deadline for GFI to file its opposition to Plaintiff’s Motion to Strike is  
17 extended from February 4, 2021 to February 10, 2021.

18 2. The deadline for Plaintiff to file its reply to GFI’s opposition to Plaintiff’s Motion  
19 to Strike is extended to February 24, 2021.

20 Dated: February 2, 2021

BERGESON, LLP

21  
22 By: /s/ John D. Pernick  
John D. Pernick  
Attorneys for Defendant  
23 GRAPH FOUNDATION, INC.

24 Dated: February 2, 2021

HOPKINS & CARLEY

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26 By: /s/ Jeffrey M. Ratinoff  
John V. Picone III  
Jeffrey M. Ratinoff  
27 Attorneys for Plaintiff  
NEO4J, INC.  
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**ATTESTATION**

I, John D. Pernick, am the ECF User whose identification and password are being used to file this **STIPULATION EXTENDING BRIEFING DEADLINES ON MOTION TO STRIKE AND [PROPOSED] ORDER**. In compliance with Civil Local Rule 5-1(i)(3), I attest that all other signatories have concurred in this filing.

Dated: February 2, 2021

By: /s/ John D. Pernick  
John D. Pernick

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